



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

be maintained upon a broader and more satisfactory ground, and that is the loss of *consortium*, or the right of the husband to the conjugal fellowship and society of his wife." This is a rather surprising assertion, as the action for loss of *consortium* is generally supposed to be maintainable only against one who seduces or entices away a wife after marriage. The New York court, however, says that the gist of the action lies in the husband being deprived of a certain right, and whether he is deprived of it after acquiring it, or prevented from acquiring it, is immaterial. In other words, "when he entered into the marriage relation, he was entitled to the company of a virtuous woman, yet, through the fraud of the defendant, that right never came to him. . . . The injury, although effected by fraud before marriage, instead of by seduction after marriage, was the same, and why should not the remedy be the same?" This reasoning seems inconclusive. In the absence of the element of deceit, it is clear that the seducer of a woman is under no liability to the man she subsequently marries. Why should the presence of this element bring the case within the scope of the action for loss of *consortium*? The defendant in *Kujek v. Goldman* had certainly done the plaintiff a great wrong, but the action for deceit afforded the latter an ample remedy. One may well wonder why the court should have gone out of its way to enter such questionable territory.

LORD RUSSELL'S VALEDICTORY TO THE AMERICAN BAR ASSOCIATION.—At Saratoga last August, after Mr. Austen G. Fox had finished the reading of his paper on Two Years' Experience of the New York State Board of Law Examiners, which is printed in this number of the REVIEW, Lord Russell arose and made some rather extended remarks. After speaking of the enormous influence exerted by the Bar in all civilized countries, and of the high importance that all who enter the profession should be required to bring to its duties an adequate equipment, he turned to the topic of the American Bar Association, and American lawyers in general, and concluded as follows: "I would like before I sit down to be allowed to express the admiration I feel, not only for the constitution of this Congress of United States lawyers, but for the scheme of its operations, and the wise purposes to which it devotes its efforts. Its work is not new to me. I have had the pleasure of seeing now for some years the record of its proceedings, and it is to me, as it was on hearing the admirable presidential address which was delivered on Wednesday, in the highest degree refreshing to find that the members of the Bar in this country are so earnestly alive to the responsibilities of their position, are so keen to observe, to weigh, to judge, to discriminate, to test the current of judgment and of legislation, and that above all they keep before themselves steadfastly and unceasingly a high ideal of what ought to be, not merely the mental equipments and the acquirements in learning, but the high moral character of the profession to which they belong."

WHO SHOULD PAY COSTS?—To leave each party to a lawsuit to pay his own expenses, as is practically done in Massachusetts, seems an evident selling of justice. Justice, to be sure, is like any other commodity in that it costs to produce it; but when the cost of justice is more than the man who needs it can afford to pay, or more than it is worth to him